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*Counsel for Plaintiffs and the Class*

[Additional Counsel Listed on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

KAJAN JOHNSON, CLARENCE  
DOLLAWAY, and TRISTAN CONNELLY, on  
behalf of themselves and all others similarly  
situated,

PLAINTIFFS,

v.

ZUFFA, LLC, TKO OPERATING COMPANY,  
LLC f/k/a ZUFFA PARENT LLC (d/b/a  
ULTIMATE FIGHTING CHAMPIONSHIP and  
UFC), and ENDEAVOR GROUP HOLDINGS,  
INC.,

DEFENDANTS.

No.: 2:21-cv-01189-RFB-BNW

**PLAINTIFFS' MOTION TO  
WITHDRAW ELLEN T. NOTEWARE  
AS COUNSEL OF RECORD**

Pursuant to Local Rule IA 11-6(b), Plaintiffs respectfully move the Court to withdraw Ellen T. Noteware as counsel of record for Plaintiffs. Ms. Noteware is no longer affiliated with the law firm Berger Montague PC. Berger Montague PC and its co-counsel will continue to

1 serve as attorneys for Plaintiffs, and Plaintiffs have already been notified of Ms. Noteware's  
2 withdrawal.

3 For these reasons, Plaintiffs respectfully request that the Court enter an order  
4 withdrawing Ms. Noteware as counsel of record for Plaintiffs.

5  
6 DATED: June 12, 2025

Respectfully Submitted,

7  
8 By: /s/ Eric L. Cramer  
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27 *Counsel for Plaintiffs and the Class*  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of June, 2025 a true and correct copy of  
**PLAINTIFFS' MOTION TO WITHDRAW ELLEN T. NOTEWARE AS COUNSEL OF  
RECORD** was served via the District Court of Nevada's ECF system to all counsel of record  
who have enrolled in this ECF system.

By: /s/ Eric L. Cramer  
Eric L. Cramer

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*Counsel for Plaintiffs and the Class*

[Additional Counsel Listed on Signature Page]

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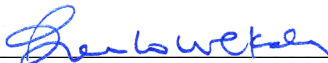
DEFENDANTS.

No.: 2:21-cv-01189-RFB-BNW

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION TO  
WITHDRAW ELLEN T. NOTEWARE  
AS COUNSEL OF RECORD**

Plaintiffs' motion to withdraw Ellen T. Noteware as counsel of record in the above captioned matter is GRANTED. The Clerk of the Court is ordered to remove Ms. Noteware's name from the docket in this case.

DATED: June 26, 2025

  
Magistrate Judge Brenda Weksler